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6 Attorneys for the Defendant

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON
9 The Honorable THOMAS O. RICE

10 **United States of America,**

11 Plaintiff,

12 v.

13 **Brian Jesus Zazueta,**

14 Defendant.

No. 2:23-cr-0036-TOR-1

Sentencing Recommendation

15 He took the easy road, the wrong road; we all make mistakes, and we learn from
16 our mistakes, and I can assure you that this lesson is now very clear to Brian.

17 Maira Guadalupe Carrizosa-Corrales – Brian’s fiancé
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24 **Sentencing Recommendation**

1 Brian was born in the United States and at the age of 8 moved to Sinaloa, Mexico
2 with his parents. He grew up with his mom, Ana Isabel Rivera-Pena, in Mexico and spent
3 very little time with his father. His father was involved with other women, had other
4 families and was busy running a “business”. Based on conversations with some of
5 Brian’s family and how his father perceived his role as a parent - mothers are meant to
6 raise their children and fathers can come and go. When Brian was a teenager, his father
7 began to show more of an interest. And the interest seems to be quite self-serving and
8 one-sided once you have a better understanding about Brian and his background.

10 Brian grew up in a culture that was very “machismo” and in order to have a
11 relationship with his father, Brian was expected to do what his father said and to work
12 closely with his father. In looking back, it seems that getting into the “family business”
13 was a way to create a relationship with his father. Prior to this, Brian and his sister were
14 essentially ignored by his father because he had moved on to other relationships.

16 Regardless of how much someone has or does not have, children yearn to have
17 relationships with their parents despite who and what their parents may be. They yearn
18 love, attention, and time. Understanding how and why Brian is involved in this situation
19 is not hard to figure out because it was a way in which he had a relationship with his father
20 and Adolfo Zazueta-Beuno is not a man you tell no.

22
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24 **Sentencing Recommendation**

1 Adolfo Zazueta-Beuno has power and that power is well known within the
2 community in Sinaloa, Mexico. This power extends to family members and individuals
3 outside of his family.

4 Brian has been in custody since March 2023. The majority of his family lives in
5 Mexico and having his family so far away has been difficult. Having spent the last 19
6 months in custody has given Brian a very clear perspective on the choices he made and
7 the impacts of drugs and addiction in our communities. He recognizes the drugs that
8 were dealt as a result of this organization is putting poison into our communities. He
9 knows he caused harm to communities and families.

11 Brian sees people in and out of the county jails he has spent time. There are times
12 that he sees the same people in and out of the jails because they are arrested, they post
13 bail, they relapse and come back into custody. Each of them saying they will do better the
14 next time; they will get clean and they will abide by the conditions set by the Court.
15 Sadly, with no resources for treatment for many of these individuals, they are right back
16 in jail after a short period of time because the addiction overcomes the desire to want to
17 get clean or the ability to find the help to get clean.

19 Brian understands the role he played in this. The individuals he meets in jail
20 represent the same people that were being distributed drugs prior to Brian's arrest. The
21 drugs that were being distributed are taking away from children, parents, families, friends
22 and our community. Brian has had 19 months to have an up close and very personal

23 **Sentencing Recommendation**
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1 understanding of the real impact of these drugs. He is not only disgusted by his own
2 contribution, but is ashamed.

3 Although he may not have had much growing up, he was raised by his mother who
4 tried to make sure her children were educated, played sports and worked hard. She taught
5 them the value and importance of being kind and respectful to other people. Brian's
6 mother and father both had interactions with the federal criminal system and his mother
7 would never want this for her son. She is heart broken. She is devastated because she
8 knows that her son will be in the federal prison system for at least a decade.

9
10 Brian's absence is not only felt by his family, but by his fiancé and children. In her
11 letter to the court, like the other letters of support, Maria Guadalupe discusses the type of
12 person Brian is for his children and their family. [See Attachment A – Letters of
13 Support]. She describes the dreams and goals they have set together and how he got
14 caught up in this situation and let himself be carried away and influenced by people who
15 pretended to be his friend. He made a huge mistake and got lost along the way, but he has
16 had a very significant wake up call and now recognizes that these "friends" were using
17 him and taking advantage of him. And these friends also include family members. Brian
18 understands that the people who genuinely care for him will always have his best interest
19 at heart and will not use him or influence him to be a part of this type of lifestyle – those
20 are not real friends or real family.
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1 Brian is facing a guideline range of 10-15 years. He has never been to prison before
2 and has never been involved the criminal justice system. A 10-year sentence is
3 significant. As noted in paragraph 206 of the PSR, “Mr. Zazueta has no prior criminal
4 convictions and a long history of polysubstance abuse. A sentence less than the low end
5 of the guideline range, but at least the statutory mandatory minimum sentence of 120
6 months custody may be sufficient but not greater than necessary to deter future conduct,
7 promote respect for the law, while reflecting the seriousness of the offense and protecting
8 the public.” [See ECF No. 297]. For reasons also set forth by the PSR writer, counsel
9 asks the Court to sentence Brian to 120 months.
10

11 Counsel respectfully asks the Court to sentence Brian to 120 months followed by 5
12 years of supervised release. Additionally, he asks the Court to recommend his
13 participation in both RDAP and First Step if he is eligible for these programs. Lastly,
14 counsel asks the Court to recommend FCI Phoenix for placement. A 10-year sentence is
15 significant and will have a life lasting impact on Brian and his family.
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24 **Sentencing Recommendation**

1 Dated: October 24, 2024

2 Respectfully Submitted,

3 S/Amy H. Rubin

4 Amy H. Rubin, WA 45874

5 Attorneys for Brian Jesus Zazueta-Bueno

6 Federal Defenders of

7 Eastern Washington and Idaho

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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Caitlin Baunsgard, Assistant United States Attorney.

S/Amy H. Rubin

Amy H. Rubin, WA 45874

Attorneys for Brian Jesus Zazueta-Bueno

Federal Defenders of

Eastern Washington and Idaho

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Email: Amy_Rubin@fd.org

Sentencing Recommendation

ATTACHMENT A.

12/Septiembre/2024

Estimado juez Thomas Rice...

Me dirijo a usted con respeto y humildad para expresar mi preocupación y solicitud en relación con el caso de mi novio Brian Jesus Zazueta, que está a punto de ser sentenciado.

Quiero compartir con usted que Brian Jesus Zazueta es una persona de buen corazón, trabajadora y responsable, le ha tocado una vida difícil donde a tenido que trabajar desde muy joven para poder salir adelante, Siempre ha hecho lo posible por darle una vida mejor a su familia en especial a su madre y a sus hijos. Ha sido un compañero leal y amoroso durante toda nuestra relación, Juntos hemos construido una relación basada en el respeto, la confianza y el apoyo mutuo, tengo 7 años conociéndolo y vamos para 3 de relación, tenemos muchos planes a futuro y sueños que queremos cumplir juntos como formar una familia, tener un trabajo de bien y estable, salir adelante juntos, ser personas de bien y tener una vida sin problemas, Soy una de las personas que mejor lo conoce en todos los sentidos y le puedo asegurar que el no es una mala persona y que tiene un gran corazón, solo es un joven con sueños y ganas de salir adelante que por eso tomo el camino fácil y equivocado, todos cometemos errores y de esos errores se aprende, le aseguro que a Brian eso le quedará muy claro y se llevará una gran lección sobre esto. Brian acá afuera solía ser una persona rodeada de mucha gente que decían ser sus amigos, gracias a su nobleza y corazón se dejó llevar y dejó entrar a su vida a personas equivocadas, hoy en día solo quedamos muy pocos a su lado; Su madre, sus hijos, sus hermanos y yo que soy su novia, esperamos con muchas ansias a Brian acá afuera por eso le pido con todo respeto que no sea tan duro con el con su sentencia, entiendo que Brian ha cometido un error, pero creo firmemente que no refleja su verdadero carácter. Estoy segura de que con la guía adecuada, podrá enmendar su error y convertirse en una persona aún mejor.

Le pido respetuosamente que al considerar la sentencia, tenga en cuenta la humanidad de Brian y el impacto que una sentencia severa tendría en su vida y en quienes lo esperamos acá afuera. Creo que una segunda oportunidad no se le niega a nadie, solo le pido de corazón que no sea tan duro con él pues aún es un joven que tendría la oportunidad de enmendar sus errores.

Sin nada más que decir me despido de usted, agradezco su tiempo y consideración.

Atentamente:

Maria Guadalupe Carrizosa

12/septiembre/2024

September 12, 2024

Dear Judge Rice,

I humbly write to you with all due respect to express my worry and request with regards to my boyfriend's case, Brian Jesus Zazueta, who is about to be sentenced.

I want to share with you that Brian Jesus Zazueta is someone with a good heart, hardworking and responsible who has been dealt a very difficult life. He has had to work from a very young age to get ahead in life and he has always done his best to give his family, especially his mother and children, a better life. He has always been a faithful and loving partner during our relationship. Together we have built a relationship based on respect, trust, and mutual support. I have known him for seven years and have been together for going on three years. We have a lot of plans and dreams together for the future, like forming a family, having good and stable employment, get head in life together, be good humans and live a life without problems. I am one of the people that best know him in all manners, and I can assure you that he is not a bad person, and he has a big heart. He is a young man with dreams and the drive to get ahead in life. He took the easy and wrong road; we all make mistakes, and we learn from our mistakes, and I can assure you that this lesson is now very clear to Brian. Out of prison Brian was a person surround by a lot of people who called themselves his friends due to his generosity and big heart. He let himself be carried away by the wrong people that he let into his life, these days there are few of us left by his side: his mother, his children, his siblings, and me, his girlfriend. We anxiously await Brian here with us, which is why I ask you with all due respect for leniency in his sentence. I understand that Brian has committed a huge mistake, but I firmly believe that it does not reflect his true character. I am sure that with the correct guidance he can correct his path and become an even better person.

I respectfully ask that as you are considering what sentence to give him, to consider Brian's kindness and the impact a severe sentence would have in his life and in the lives of those of us that await him here. I believe that nobody should be denied a second chance, I just ask you from the bottom of my heart, to not be too tough on him because he is a young man who can still have time to change.

Without further ado, thank you for your time and consideration.

Sincerely,

[signature]

A Quien corresponda

Hola soy mamá de Brian Jesús Les Pido de favor que sean comprensivos con el mi hijo se equivocó pero yo les aseguro que él es un niño ejemplar es muy buen muchacho él nunca atendió problemas en ningún lado era un estudiante bueno y le encantaba el deporte de niño pero a veces nos equivocamos y cometemos errores y pues somos seres humanos x no perfectos se que mi niño se equivocó pero yo como mamá les suplico que sean comprensivos con él y sean justos con él le suplico que sean comprensivos con él y sean justos x que él es un buen muchacho x muy respetuoso y no grosero es muy noble nunca atendió problemas en ningún lado él es muy amistoso y responsable para mí es un niño ejemplar y es un niño que yo adoro con todo mi corazón es muy bueno no es problemático ni grosero con nadie es muy noble mi Rex yo me siento muy triste x roto mi corazón x lo que está viviendo mi Brian solo les pido su ayuda para que sea una sentencia corta x que él no merezca tanto tiempo pero ya solo queda en sus manos y en Dios x que me lo

Scribe

cuiden mucho + me en tienda
como Papas que yo estoy muy de machado
Preocupado x su sentencia
que dcos los bendiga
Atenta mente. mama de brian
Amen +

To Whom It May Concern:

Hello, I am Brian Jesus's mom. I ask you to please be understanding with my son. He did wrong but I can assure you that he is an exemplary son and very good young man. He has never had any problems anywhere. He was a good student and as a child loved sports. Unfortunately, we sometimes make mistakes because we are human beings, and we are not perfect. I know my boy did wrong, but as a mother I beg you to be understanding and just towards him because he is a good and respectful young man who is not ill behaved or rude. He is very kind and has never gotten into trouble anywhere. He is friendly and responsible, to me he is an exemplary son and I adore him with all my heart. He is very good, doesn't cause trouble, is not rude with anyone, he is very kind, my king. I am very sad, and my heart is broken because of what my Brian is going through. I only ask for your help so that he gets a short sentence because he doesn't deserve too much time. He is in your hands and God's, may he be well taken care of and please understand me, as a parent I am very worried about his sentence.

May God bless you.

Sincerely, Brian's mom

Amen

I am Daniela Zazueta, Brian's sister. I would like to ask you to have compassion for my brother, he is a good man with a good heart. He is my protector, my best friend, my other half and my blood. He recognizes that he was wrong. This is the first time he has made this mistake and it will never happen again. The fact that he is in jail has hurt me a lot. He has always been protective of me; he has always been there for me when I need him. He has two children who cry all the time because they miss their father. He has always been there for them; the children are his adoration. He is my older brother. I miss his advice and his scolding. Thanks to him I am who I am now because he taught me to always be good to people who need our help and not to be resentful. Brian has always been very respectful and helps people who need it.

I have no words to describe the love I have for my brother; I only know that I love him and I miss him because he is not with me. My brother has always been there to make sure that my mother and I never lack anything.

A quien correspondas

Por medio de la presente me dirijo
con respeto haciendo constar que:
Brian Jesus Zazueta Rivas es una
persona noble, educada de buen
comportamiento, respetuoso teniendo
yo Nancy Karina 23 años de conocerlo
y conviviendo con el desde niño
a tenido un gran corazón de mu-
chos buenos sentimientos siempre dirigiendo
a los demás con respeto asegurando
el cariño y amor de todas las
personas que convivimos con el.
Son tantas las cualidades que solo
Nancy pueda decir deseando
BENDICIONES

Atentamente:
Nancy Karina J.

To Whom It May Concern:

With all due respect I write this letter to let you know that Brian Jesus Zazueta Rivas is a generous, educated, well behaved and respectful person. I, Nancy Karina, have known and interacted with him for 23 years. Since he was a child, he has always had a great heart with good sentiments and always addresses others with respect, thereby gaining the love of all those of us who interact with him. There are so many qualities that as his aunt I can describe.

Blessings.

Sincerely,

[signature]

DEPENDENCIA—JUZGADO MENOR.

ASUNTO:

CONSTANCA DE RECOMENDACIÓN.

EL QUE SUSCRIBE EL C. SECRETARIO DE ESTE JUZGADO MENOR ENCARGADO DEL DESPACHO POR MINISTERIO DE LEY DE ESTA POBLACION DE QUILA, MUNICIPIO DE CULIACAN ESTADO DE SINALOA POR MEDIO DE LA PRESENTE HAGO CONSTAR:

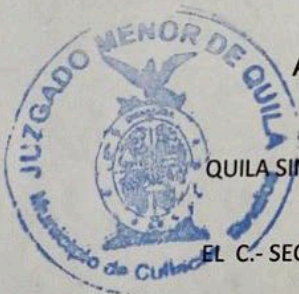
DE QUE EL C.- BRIAN JESUS ZAZUETA, A QUIEN CONOZCO PERSONALMENTE ES VECINO DE ESTA SINDICATURA DE QUILA SINALOA Y ASI MISMO SE HACE CONSTAR QUE EL C. BRIAN JESUS ZAZUETA TIENE SU DOMICILIO EN CALLE IGNACIO MANUEL ALTAMIRANO DE LA COLONIA SANTA MARIA DE ESTA SINDICATURA DE QUILA SINALOA EL CUAL RECOMIENDO QUE ES UNA PERSONA DE BUENA CONDUCTA Y RESPONSABLE EN TODA SU PERSONA YA QUE EL TIEMPO QUE ESTUVO VIVIENDO EN ESTA SINDICATURA DE QUILA SINALOA SE DEDICO A LAS LABORES DE LA AGRICULTURA Y DEL CAMPO . - - - - -

ATENTAMENTE.-

QUILA SINALOA A 13 DE SEPTIEMBRE DEL AÑO 2024.

EL C.- SECRETARIO DEL JUZGADO MENOR ENCARGADO DEL DESPACHO

POR MINISTERIO DE LEY. LIC. JULIETA FUENTES HERNANDEZ.-



Municipal Court

Letter of Recommendation

The undersigned clerk of this municipal court overseeing this office by virtue of the law of this city of Quila, municipality of Culiacán in the State of Sinaloa declares the following:

The Brian Jesus Zazueta, whom I personally know, is a resident of this town of Quila, Sinaloa whose residence is on Calle Ignacio Manuel Altamirano in the Santa Maria neighborhood in this town of Quila, Sinaloa. I can attest that he is a well behaved and responsible person because during the time he was residing in this town of Quila, Sinaloa he worked in agriculture and working the land.

[Seal] Sincerely,

Quila, Sinaloa September 13, 2024

Municipal Court Judicial Secretary

[signature]

Julieta Fuente Hernandez



AYUNTAMIENTO DE
CULIACÁN
CAPITAL DE BIENESTAR

Av. Álvaro Obregón y Mariano Escobedo
C.P. 80000, Culiacán, Sinaloa., México

Teléfono: **+6677 58 01 01**
Web: **www.culiacan.gob.mx**

SINDICATURA MUNICIPAL DE QUILA, CULIACÁN, SIN. 13 DE SEPTIEMBRE DE 2024.

A QUIEN CORRESPONDA:

El Que Suscribe C. Síndico Municipal de Quila, Municipio de Culiacán, Estado de Sinaloa.

HACE CONSTAR:

Que el C. **BRIAN JESUS ZAZUETA**; es vecino de esta Sindicatura de Quila, Culiacán, Sinaloa, con domicilio calle Ignacio Manuel Altamirano, Colonia Santa María y durante el tiempo que lo conocí presento una conducta normal.

Sin otro particular de momento quedo como su afectísimo amigo y seguro Servidor.

ATENTAMENTE



SINDICATURA MUNICIPAL
DE QUILA
MUNICIPIO DE CULIACÁN

LIC. MARCO ANTONIO GARCIA ROJO
SINDICO MPAL. DE QUILA, SIN.

c.c.p. archivo

[Header]

Post of municipal representative of Quila, Culiacán, Sinaloa September 13, 2024

To whom it may concern:

The undersigned municipal representative of Quila, municipality of Culiacán in the State of Sinaloa

Attests

That Brian Jesus Zazueta is a resident of this town of Quila, Culiacán, Sinaloa with a residence on Ignacio Manuel Altamirano Street, in the neighborhood of Santa Maria and during that time that I knew him demonstrated normal behavior.

Without further ado, your friend who is at your service.

Sincerely,

[seal & signature]

Marco Antonio Garcia Rojo

Municipal Representative of Quila, Sinaloa

A quien Corresponda:

Yo Lic. Trabajo Social Brenda Isela Bustamante Burgos.
Por medio de esta carta hago conocimiento que el Joven. Brian Jesus Zazueta es una persona seria, honesta, responsable la cual los 20 años que tengo de conocerlo no a presentado ningun problema con ninguna autoridad y persona es una persona trabajadora el cual se desempeña en las tierras de riego de su mama no es una persona que tenga vicios y que haya presentado conductas indevidas por el momento quedo asos ordenes
gracias

Atte. B. Burgos Brenda Isela.

To Whom It May Concern:

I am Brenda Isela Bustamante Burgos and I am a licensed social worker. Through this letter I would like to let you know about how I know the young man Brian Jesus Zazueta. He is a serious, honest, and responsible person whom I have known for twenty years, during which time he has not shown himself get into trouble with the law or anyone. He is a hard worker who carries out the irrigation work needed on his mother's properties. He is not someone prone to vices or inappropriate behaviors. That is all I can provide for now but am at your service if needed. Thank you.

Sincerely: [signature]